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**From:** Cheung, Wendy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DDF2CC506357425F9F784801CC8F6B7D-CHEUNG, WENDY]  
**Sent:** 8/9/2016 2:24:40 PM  
**To:** Tinsley, Chuck [Tinsley.Chuck@epa.gov]  
**Subject:** RE: (to Wendy only) RE: UIC Methods Question

## Ex. 5 Deliberative Process (DP)

-----Original Message-----

**From:** Tinsley, Chuck  
**Sent:** Tuesday, August 09, 2016 7:58 AM  
**To:** Cheung, Wendy <Cheung.Wendy@epa.gov>  
**Subject:** (to Wendy only) RE: UIC Methods Question

## Ex. 5 Deliberative Process (DP)

Chuck Tinsley, Petroleum Engineer  
Underground Injection Control Section  
303-312-6266 office  
tinsley.chuck@epa.gov

mailing address:  
EPA Region 8 (8P-W-UIC)  
1595 Wynkoop Street  
Denver, CO 80202

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**From:** Todd, Jason  
**Sent:** Tuesday, August 9, 2016 07:37 AM  
**To:** Cheung, Wendy  
**Cc:** Tinsley, Chuck  
**Subject:** RE: UIC Methods Question

Yes, thanks so much Wendy. That's very helpful. It appears as if most regions are using the SW-846 methodologies where appropriate, even though that document isn't explicitly spelled out in existing UIC regulations. Per usual, it seems it's an area where things could be updated to represent current standard operating procedures. Thanks again for the rapid turnaround.

Jason

**From:** Cheung, Wendy  
**Sent:** Monday, August 08, 2016 5:55 PM  
**To:** Todd, Jason <Todd.Jason@epa.gov>  
**Cc:** Tinsley, Chuck <Tinsley.Chuck@epa.gov>  
**Subject:** FW: UIC Methods Question

Jason,

Does the below answer your question? If not, please contact Valois directly. She's most knowledgeable about this.

Wendy

**From:** Shea, Valois  
**Sent:** Monday, August 08, 2016 3:04 PM  
**To:** Cheung, Wendy <Cheung.Wendy@epa.gov><mailto:Cheung.Wendy@epa.gov>  
**Subject:** RE: UIC Methods Question

Yes. This refers to the requirement to use approved drinking water analytical methods for constituents regulated under the SDWA.

<https://www.epa.gov/dwanalyticalmethods/approved-drinking-water-analytical-methods>

For constituents without MCLs or Health Advisories, we usually use SW-846 and Clean Water Act methods.

The approved drinking water methods are designed for clean water without many suspended solids, but often UIC injectates have suspended solids that prevent the samples from being analyzed using the approved drinking water methods. The UIC regulations allow for the use of alternative analytical methods if it can be established that the methods have detection limits equivalent to the approved drinking water methods. The use of alternative methods must also be approved by the UIC Director. Permittees and our EPA lab have been able to demonstrate that SW-846 methods have equivalent detection limits for most analytes.

I hope this helps!  
Valois

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Valois Shea  
U.S. EPA Region 8  
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From: Cheung, Wendy  
Sent: Monday, August 08, 2016 12:33 PM  
To: Shea, Valois <[Shea.Valois@epa.gov](mailto:Shea.Valois@epa.gov)<<mailto:Shea.Valois@epa.gov>>>  
Subject: FW: UIC Methods Question

Sorry to bug you again, but I think you may have the explored this for Dewey Burdock? If not, then the work you did for Class V sampling?

From: Todd, Jason  
Sent: Monday, August 08, 2016 12:21 PM  
To: Cheung, Wendy <[Cheung.Wendy@epa.gov](mailto:Cheung.Wendy@epa.gov)<<mailto:Cheung.Wendy@epa.gov>>>; Tinsley, Chuck <[Tinsley.Chuck@epa.gov](mailto:Tinsley.Chuck@epa.gov)<<mailto:Tinsley.Chuck@epa.gov>>>  
Subject: UIC Methods Question

Wendy and Chuck,  
Bill Bates here in HQ gave me your names as good people to talk to about a question we're investigating here. We're generally asking several of the NTW members to see if they can help fill in a potential knowledge gap. As I'm sure you more aware of than me, as part of the UIC regulations, there is a requirement that monitoring for particular constituents requires following published methodologies. The particulars of that monitoring/methodology requirement is laid out in §144.52(5) with the following language:

"Monitoring and reporting requirements as set forth in 40 CFR part 146. The permittee shall be required to identify types of tests and methods used to generate the monitoring data. For EPA administered programs, monitoring of the nature of injected fluids shall comply with applicable analytical methods cited and described in table I of 40 CFR 136.3 or in appendix III of 40 CFR part 261 or in certain circumstances by other methods that have been approved by the Regional Administrator."

## Ex. 5 Deliberative Process (DP)

Best,  
Jason

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